

STEVEN W. MYHRE
Acting United States Attorney
District of Nevada
Nevada Bar No. 9635
DANIEL R. SCHIESS
NADIA J. AHMED
Assistant United States Attorneys
ERIN M. CREEGAN
Special Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
steven.myhre@usdoj.gov
nicholas.dickinson@usdoj.gov
nadia.ahmed@usdoj.gov
erin.creegan@usdoj.gov

Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CLIVEN D. BUNDY,
AMMON E. BUNDY,

Defendants.

2:16-CR-00046-GMN-PAL

**GOVERNMENT'S MOTION TO
CONTINUE RESPONSE
DEADLINES FOR MULTIPLE
DEFENSE MOTIONS (ECF Nos.
2959, 2978, 2980, 3031, 3034, and 3038)**

CERTIFICATION: This Motion is timely filed.

The United States, by and through the undersigned, hereby files this Motion
to Continue Response Deadlines for the following motions filed by the defense:

| No. | Motion Title | Filed by: |
|------|--|-----------------------------------|
| 2959 | Motion to Dismiss for Continuing Pattern of Brady & Other Discovery Violations | Ryan W. Payne |
| 2978 | (Sealed) Supplement to ECF No. 2959 | Ryan W. Payne |
| 2980 | Motion to Dismiss, Disqualify, Unseal and to Enjoin Further Prosecution | Cliven D. Bundy Ammon E. Bundy |

| No. | Motion Title | Filed by: |
|------|--|---------------|
| 3031 | Motion to Strike ECF No. 3028 | Ryan W. Payne |
| 3034 | Notice of Existence (sic) of Vested Water Rights Blonging (sic) to Cliven Bundy | Ryan C. Bundy |
| 3038 | Motion to Dismiss for Brady & Giglio Violations | Ryan C. Bundy |

In light of the current issues before the court, i.e. whether the case should be dismissed outright based on the Court's determination of Brady/Giglio violations, any response would be mooted in the event the court rules adversely against the government. Conversely, the motions would become ripe in the event the court rules that trial should proceed forward. Thus, whether a response is due depends on the court's ultimate ruling on or after January 8, 2018, the present date set for hearing on whether a mistrial will be granted without or with prejudice.

WHEREFORE, for all the foregoing reasons, the government respectfully requests that the Court stay the date for government responses until such time as the Court determines the outcome of the present Motion for Mistrial due to Brady/Giglio violations.

DATED this 26th day of December, 2017.

Respectfully,

STEVEN W. MYHRE
Acting United States Attorney


/s/ Steven W. Myhre

IT IS SO ORDERED.

DANIEL R. SCHIESS
NADIA J. AHMED
Assistant United States Attorneys

Attorneys for the United States

DATED this 28 day of December, 2017.



Gloria M. Navarro, Chief Judge
United States District Court

CERTIFICATE OF SERVICE

I certify that I am an employee of the United States Attorney's Office. A copy of the foregoing **GOVERNMENT'S MOTION TO CONTINUE RESPONSE DEADLINES FOR MULTIPLE DEFENSE MOTIONS (ECF Nos. 2959, 2978, 2980, 3031, 3034, and 3038)** was served upon counsel of record, via Electronic Case Filing (ECF).

DATED this 26th day of December, 2017.

/s/ Steven W. Myhre

STEVEN W. MYHRE
Assistant United States Attorney